

Message

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**From:** TechCheck, LLC [Ex. 6 Personal Privacy (PP)]  
**Sent:** 4/29/2021 7:22:01 PM  
**To:** Bauer, Jeff [Bauer.Jeff@epa.gov]  
**CC:** Hoffman, Hugo [Hoffman.Hugo@epa.gov]  
**Subject:** Re: PMN follow up

Hi Jeff,

Thank you for your time yesterday regarding this case. I spoke with the submitter this morning and they confirmed that equipment cleaning rinsate is NOT washed down the drain. They indicated that their customers are using rags/wipes to wipe down the equipment and that these are typically incinerated, or just landfilled. They do NOT pour any rinsate down the drain – really for two primary reasons - 1) they have to comply with any permit restrictions and 2) these are ink blends. It doesn't take but a few drops of ink to color a lot of water... They would clearly have an issue with their local water treatment facility...if the ink turned the water colors..

They are going to see if they can get statements from their likely customers (they don't have anybody buying this yet)...but this could take a bit. I just wanted to provide the above to you to share it with the engineer to see if that type of information would satisfactorily address the predicted releases to water.

Thank you,  
Marcy

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**From:** "Bauer, Jeff" <Bauer.Jeff@epa.gov>  
**Date:** Tuesday, April 27, 2021 at 5:53 PM  
**To:** "TechCheck, LLC" [Ex. 6 Personal Privacy (PP)]  
**Cc:** "Bauer, Jeff" <Bauer.Jeff@epa.gov>, "Hoffman, Hugo" <Hoffman.Hugo@epa.gov>  
**Subject:** RE: PMN follow up

Marcy,

I will review the case tomorrow and get back to you with a status update and see what is needed to keep this case moving.

I will look for the data you sent in and get it reviewed.

Jeff

Jeff Bauer - Program Manager  
United States Environmental Protection Agency (USEPA)  
Office of Pollution Prevention and Toxics (OPPT)  
New Chemicals Program (7405M)

**Ex. 6 Internal Link**

EPA East Building, room 4133M

1201 Constitution Ave., NW  
Washington, DC 20004  
Phone: 202-564-9042, Fax: 202-564-9490

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**From:** TechCheck, LLC { **Ex. 6 Personal Privacy (PP)** }  
**Sent:** Tuesday, April 27, 2021 5:38 PM  
**To:** Bauer, Jeff <Bauer.Jeff@epa.gov>  
**Subject:** FW: PMN follow up

Hi Jeff,

I hope you are doing well. It has been a while since we spoke last. I am writing regarding a PMN being handled by Will. I received his out of office indicating he is gone until May 10. Given that is ~2 weeks – I figured I would reach out to you, since he listed your name as a person to contact.

The case number ends in 22 from this year...

Initially it was being flagged as PBT but that has since been updated, and is no longer B. I understand that there is likely going to be a CO issued for water restrictions, but I haven't heard anything more on this case since Apr 16.

Could you please let me know.

Also – I just submitted an amendment with an OECD 471 study. This shouldn't change anything in the human health assessment but I wanted to alert you that this was submitted today.

Please let me know if you have any questions regarding the above and if possible, can you please call/email me an update regarding this case.

Thank you,  
Marcy Gainey  
919-744-5667

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**From:** "TechCheck, LLC" { **Ex. 6 Personal Privacy (PP)** }  
**Date:** Tuesday, April 27, 2021 at 1:21 PM  
**To:** "Wysong, William" <[wysong.william@epa.gov](mailto:wysong.william@epa.gov)>  
**Subject:** Re: PMN follow up

Hi Will,

Just checking in on the status of the PMN?

I got side tracked about uploading the study – I will do that today.

Could you please provide me an update.

Thank you,  
Marcy

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**From:** "Wysong, William" <[wysong.william@epa.gov](mailto:wysong.william@epa.gov)>  
**Date:** Friday, April 16, 2021 at 10:54 AM

**To:** "TechCheck, LLC" <[Ex. 6 Personal Privacy (PP)]>

**Subject:** RE: PMN follow up

This is from equipment cleaning. Container cleanout is assessed to incineration or landfill.

I am checking with the relevant disciplines to see if any of their calculations need to be updated in consideration of the new fate ratings.

Yes, please submit the new test data as an attachment to the PMN since we are still in the review period.

Thanks,  
Will

**Will Wysong** | Program Manager

New Chemicals Division  
Office of Pollution Prevention and Toxics  
Office of Chemical Safety and Pollution Prevention  
U.S. Environmental Protection Agency  
Phone: (202) 564-4163 | Fax: (202) 564-9490

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**From:** TechCheck, LLC <[Ex. 6 Personal Privacy (PP)]>

**Sent:** Friday, April 16, 2021 10:25 AM

**To:** Wysong, William <[wysong.william@epa.gov](mailto:wysong.william@epa.gov)>

**Subject:** Re: PMN follow up

Wow – 80 seems like a lot... Is this from drum wash out?

If so – would use of pails for the final ink blends address this?

Also – we have a tox test that was completed – AMES I think. Results were good. Should I submit this as an amendment so EPA has it?

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**From:** "Wysong, William" <[wysong.william@epa.gov](mailto:wysong.william@epa.gov)>

**Date:** Friday, April 16, 2021 at 8:39 AM

**To:** "TechCheck, LLC" <[Ex. 6 Personal Privacy (PP)]>

**Subject:** RE: PMN follow up

Hello Marcy,

Sorry for the delay. I have received the completed human health risk assessment report for this case. We will discuss this internally on Tuesday and determine the appropriate risk management measures. Now that I have the report, I will prepare to send it to you along with the updated fate report you requested.

Regarding water releases, our modeling shows the chronic COC of 3 ppb being exceeded for 80 days per year during use.

Thanks,  
Will

**Will Wysong** | Program Manager

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**From:** TechCheck, LLC [Ex. 6 Personal Privacy (PP)]  
**Sent:** Tuesday, April 6, 2021 4:21 PM  
**To:** Wysong, William <[wysong.william@epa.gov](mailto:wysong.william@epa.gov)>  
**Subject:** Re: PMN follow up

Hi Will,

Thanks. I guess if the human health report is different than the initial one – could you please send both.

Otherwise – the fate report is sufficient.

Regarding the Consent Order- I would assume this will be a release to water restriction based on the COC. I know there is drum wash out – I think this fell below the 20 days exceeding the COC... but I wanted to make sure.

Thank you,  
Marcy

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**From:** "Wysong, William" <[wysong.william@epa.gov](mailto:wysong.william@epa.gov)>  
**Date:** Thursday, April 1, 2021 at 2:07 PM  
**To:** "TechCheck, LLC" [Ex. 6 Personal Privacy (PP)]  
**Subject:** RE: PMN follow up

Hi Marcy,

With a B score of 1, this will no longer be considered a potential PBT substance.

To clarify, which reports would you like? Both Human Health and Fate?

It's still a little premature to discuss the determination without the human health report. However, we identified chronic risks to the environment back in December so a consent order was already a likely outcome. Feel free to call if you'd like to discuss this further.

Thanks,  
Will

**Will Wysong** | Program Manager

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**From:** TechCheck, LLC [Ex. 6 Personal Privacy (PP)]  
**Sent:** Thursday, April 1, 2021 8:42 AM  
**To:** Wysong, William <wysong.william@epa.gov>  
**Subject:** Re: PMN follow up

Hi Will,

This is great news. Thank you.

I am okay not meeting if indeed this changes the outcome. Would it be possible to get the updated reports once complete?

What is the proposed conclusion for this case? Will it likely receive a CO, given the latest news from the EPA, that there are no more "not likely" with SNUR conclusions?

Thank you,  
Marcy

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**From:** "Wysong, William" <wysong.william@epa.gov>  
**Date:** Thursday, April 1, 2021 at 7:20 AM  
**To:** Marcy TechCheckLLC [Ex. 6 Personal Privacy (PP)]  
**Subject:** RE: PMN follow up

Hi Marcy,

After additional investigation and consideration of the fate characteristics of the substance, the team has decided to re-rate to B1. The assessors found that many chemicals in the same category (Rosin acids) in ECHA have high modeling results but have very low BCF measured value. Because the solubility is high, the Kow values used to calculate BAF were adjusted to lower values to prevent over-estimate of BAF.

I believe this change will make it unnecessary for you to submit any additional documentation or for us to have the conference call, but if you would still like to speak with the fate team then I can keep it on the calendar. I have also been informed by the human health risk assessment team that they expect to complete their report in the next two weeks (although that may be pushed back due to unforeseen delays).

Thanks,  
Will

**Will Wysong** | Program Manager  
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**From:** Marcy TechCheckLLC [Ex. 6 Personal Privacy (PP)]  
**Sent:** Wednesday, March 31, 2021 4:59 PM  
**To:** Wysong, William <wysong.william@epa.gov>  
**Subject:** Re: PMN follow up

Hi Will,

Ok - let's plan for the following week. That will give me time to pull together the written info.

Thank you,  
Marcy

On Mar 31, 2021, at 2:44 PM, Wysong, William <[wysong.william@epa.gov](mailto:wysong.william@epa.gov)> wrote:

Hi Marcy,

The rest of next week looks full but I could push it back to Monday the 12<sup>th</sup> at 1:30pm if that's OK.

Thanks,  
Will

**Will Wysong** | Program Manager

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**From:** TechCheck, LLC Ex. 6 Personal Privacy (PP)  
**Sent:** Wednesday, March 31, 2021 12:50 PM  
**To:** Wysong, William <[wysong.william@epa.gov](mailto:wysong.william@epa.gov)>  
**Subject:** Re: PMN follow up

Hi Will,

Yes – Monday April 5 at 1 EST will work fine.

Although I haven't had time to prepare anything and it is already Wed. Perhaps we schedule for later next week so I can submit something by Monday.

Thank you,  
Marcy

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**From:** "Wysong, William" <[wysong.william@epa.gov](mailto:wysong.william@epa.gov)>  
**Date:** Friday, March 26, 2021 at 1:03 PM  
**To:** "TechCheck, LLC" <Ex. 6 Personal Privacy (PP)>  
**Subject:** RE: PMN follow up

Hi Marcy,

I will defer to the fate assessor to answer those questions directly. Are you available for a conference call on Monday, April 5<sup>th</sup> at 1:00pm Eastern?

We're asking that you prepare a document outlining your concerns and submit it through CDX. This can be fairly informal, just something that states your main concerns, questions, and rationale. Please submit early next week if possible so we have enough time to look it over.

Thanks,  
Will

**Will Wysong** | Program Manager

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**From:** TechCheck, LLC <Ex. 6 Personal Privacy (PP)>  
**Sent:** Wednesday, March 24, 2021 11:40 AM  
**To:** Wysong, William <[wysong.william@epa.gov](mailto:wysong.william@epa.gov)>  
**Subject:** Re: PMN follow up

Hi Will,

If the structures are the same why does the rating change?

Further – does the fate assessor consider the fact that the major predicted hydrolysis product would also further hydrolyze (into the two starting materials)?

Sounds good for a call – I am traveling on Friday but have some time next week – Mon-Wed.

Thank you,  
Marcy

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**From:** "Wysong, William" <[wysong.william@epa.gov](mailto:wysong.william@epa.gov)>  
**Date:** Wednesday, March 24, 2021 at 10:00 AM  
**To:** "TechCheck, LLC" <Ex. 6 Personal Privacy (PP)>  
**Subject:** RE: PMN follow up

Hi Marcy,

Sorry for the delay in responding. The fate assessor confirmed that the structures are exactly the same for the LVE. For the PMN, our BAF predictions indicated that the major component of the hydrolysis product should be re-rated to B2 (vs. B1 for the LVE). Without submitted BCF test data, we are unable to re-rate.

I'll get back to you later today or tomorrow with some possible times for a conference call.

Thanks,  
Will

**Will Wysong** | Program Manager

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**From:** TechCheck, LLC <Ex. 6 Personal Privacy (PP)>

**Sent:** Thursday, March 11, 2021 10:04 AM

**To:** Wysong, William <[wysong.william@epa.gov](mailto:wysong.william@epa.gov)>

**Subject:** Re: PMN follow up

Sounds good Will. Thank you.

One thing I did learn yesterday – and this came from the analytical chemist who provided the peak intensities for the various reaction products...

*“you have to be careful with specifying percentages, this is the danger looking only to the Excel file, in the report is explained that the obtained numbers can not be used to calculate percentages. The reason for this is that every mass species has a different response in the ToF, and this parameter is not known. Although the samples are standardized, because of this fact, you can only compare the same mass species between the different samples and make a conclusion of a relative ratio, but if you want to obtain mass-% you have to make an external calibration with every mass species and compare against the obtained mass intensity, but this is the problem here, there is no standard for every species available.”*

I’m sure this doesn’t change the “overall” assumption that the triacid is formed...but it does sound like the assumed percentages are off because of the point above. Could you please share this with the Fate engineer.

Thank you,  
Marcy

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**From:** "Wysong, William" <[wysong.william@epa.gov](mailto:wysong.william@epa.gov)>

**Date:** Thursday, March 11, 2021 at 8:02 AM

**To:** "TechCheck, LLC" <Ex. 6 Personal Privacy (PP)>

**Subject:** RE: PMN follow up

Hi Marcy,

There’s a system outage that’s preventing me from getting you that document. I will let you know when I am able to access it. Thanks for your patience.

I’ll go ahead and move forward on setting up a call. Thanks for sharing your availability.



**Will Wysong** | Program Manager

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**From:** TechCheck, LLC <Ex. 6 Personal Privacy (PP)>  
**Sent:** Tuesday, March 9, 2021 9:49 AM  
**To:** Wysong, William <[wysong.william@epa.gov](mailto:wysong.william@epa.gov)>  
**Subject:** Re: PMN follow up

Hi Will,

Thank you. The only bad day is usually Wed. I am usually good between 9-1 CT any other day for the most part.

But – before we meet – is it possible to get the structures from the LVE. I realize they determined the approach was not as good as how they assessed the PMN, but if the LVE showed the hydrolysis structures to be essentially the same as the PMN (maybe with an additional step) – it is possible to consider this isn't bioaccumulative. Ultimately – the PMN case is being flagged based on the assumed hydrolysis adduct with no further consideration that this adduct will also hydrolyze. Based on the structures in the PMN fate report – I do believe the major hydrolysis adduct will further hydrolyze into essentially the starting materials and therefore wouldn't be bioaccumulative. I think the fate report from the LVE could show this – but I need the structures to know how the LVE substance was characterized.

Thank you!  
Marcy

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**From:** "Wysong, William" <[wysong.william@epa.gov](mailto:wysong.william@epa.gov)>  
**Date:** Tuesday, March 9, 2021 at 8:31 AM  
**To:** "TechCheck, LLC" <Ex. 6 Personal Privacy (PP)>  
**Subject:** RE: PMN follow up

Hi Marcy,

The fate assessment team determined that the approach used for the LVE was not the most appropriate for the substance. I brought up the differences in the reports some time ago and it was discussed at length internally. As you've suggested, I think the best way forward is to set up a call with the fate assessor to properly answer your questions. Are there any particular dates/times next week that would work well for you?

Thanks,  
Will

**Will Wysong** | Program Manager  
New Chemicals Division

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**From:** TechCheck, LLC <[REDACTED]> **Ex. 6 Personal Privacy (PP)**  
**Sent:** Friday, March 5, 2021 2:05 PM  
**To:** Wysong, William <[wysong.william@epa.gov](mailto:wysong.william@epa.gov)>  
**Subject:** PMN follow up

Hi Will,

I hope you are doing well. So I reviewed the fate/structure report together... I have included a screen shot from the structure report – whereby I have masked part of the structures...

So – according to the report – Structure 2 is the main species formed and Structure 1 is the major hydrolysis product.

Further – according to the report – Structure 1 has the issue with potential persistence and bioaccumulation.

But – I pulled up the Fate report from the LVE. Granted I don't have the structures from the LVE...so I don't know exactly what is being referenced here – but in this case the “major hydrolysis product” has a low potential for bioaccumulation.

My point is – even if the env fate reviewer for the PMN feels the hydrolysis adduct is different than the LVE, ultimately the hydrolysis adduct for the PMN (Structure 1) will further hydrolyze – ultimately into the two starting materials, so I'm not sure how/why the PMN report would show higher bioaccumulation than LVE.

Does this make sense? Could we discuss with the PMN Fate engineer?

Also – could you please send me the structures from the Fate report for the LVE – so I can compare the two.

Thank you!  
Marcy

<image001.png>

<image002.png>